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May 6, 2022

VIA ECF

Honorable Loretta A. Preska United States District Court Southern District of New York 500 Pearl Street New York, NY 10007-1312

Re: Giuffre v. Dershowitz, Case No.: 19-cv-03377-LAP

Request to File Under Seal

Dear Judge Preska:

Pursuant to Rule 1.A of Your Honor's Individual Practices, Professor Alan Dershowitz ("Professor Dershowitz") respectfully requests leave to file <u>under seal</u> a letter to the Court seeking the Court's intervention with respect to a number of issues arising out of Plaintiff's April 13 and 14 deposition, which has been suspended. As grounds therefor, Prof. Dershowitz states that his letter quotes from and attaches Plaintiff's deposition transcript, which Plaintiff has designated confidential under the Agreed Protective Order (ECF No. 227). Prof. Dershowitz challenges this designation in his letter, but until such time as the transcript is de-designated (either by Court order or agreement of the parties), the letter and the transcript must be filed under seal pursuant to the terms of the Protective Order.

Respectfully submitted,

/s/ Christian G. Kiely Christian G. Kiely

cc: All counsel of record, via ECF